




# Management Instruction

Date Issued 8/15/91	Filing Number AS-550-91-10
Effective Date Immediately	Obsoletes N/A
Originating Organization & OCC Code Administrative Services Group (ASG) AS1	
Signature & Title  Mitchell H. Gordon Senior Asst. Postmaster General, ASG	

## Title

Pollution Prevention Program

### I. Purpose

This instruction describes standard environmental and USPS policies and guidelines for establishing a pollution prevention program to manage and reduce waste in all postal facilities. It also provides methods for complying with federal, state, local, and postal policies and regulations.

### II. Program Implementation Phases

This program consists of two phases--recycling and source reduction. However, this instruction contains the basic outline for developing and implementing a recycling program. Specific instructions for implementing this phase are covered in Handbook AS-550, *USPS Recycling Guide*, which will be published and distributed in the near future. The instructions for source reduction are in the planning stage and will be issued as a separate handbook at a later date.

### III. Policy

#### A. USPS Commitment

The Postal Service is committed to source reduction and recycling as a sound environmental practice. Our primary concern is for the well-being of our employees, customers, and the communities we serve. In the performance of its mission to provide prompt, reliable, and efficient postal services to all communities, the U.S. Postal Service will conduct its activities in a manner protecting human health and the environment.

#### B. Compliance

The Postal Service will comply with all applicable environmental laws and regulations governing our activities, and will not hesitate to exceed legal requirements when, in its judgment, it is in order.

### C. General Policy Guidelines

In establishing postal regulations and practices, the Postal Service will, as appropriate, implement policies that:

a. Encourage the use of nonpolluting technologies and waste minimization in the development of equipment, products, and operations.

b. Promote the sustainable use of natural resources and protection of the environment through conservation, recycling, and reuse of material in our own processes, and as we work with customers in the preparation of mail.

c. Include environmental considerations among the criteria by which projects, products, processes, and purchases are evaluated.

d. Develop in postal employees an awareness of environmental responsibilities and encourage their adherence to sound environmental practices.

e. Maintain an ongoing assurance program to measure progress toward meeting postal environmental objectives.

### IV. Scope

The policies and guidelines in this instruction apply to all postal employees, programs, products, and services.

### V. Definitions

#### A. Pollution Prevention

The reduction of multi-media pollutants at the source and by the use of environmentally sound recycling. This prevention includes all regulated toxic and nontoxic substances.

Distribution  All Headquarters units, Headquarters field units, and field offices	Special Instructions  Organizations listed under Distribution may order additional copies from materiel distribution centers (MDCs). Use Form 7380, <i>MDC Supply Requisition</i> , and specify the filing number.  You may redistribute this document by photocopying it, but do not paraphrase or otherwise revise it.
---	--

## B. Waste

Any material discarded as worthless, defective, or of no further use which, when disposed of, may pose a threat to human health or the environment.

## C. Source Reduction

Any action that reduces the amount of waste resulting from a process including: modifying processes, substituting materials or improving materials purity, implementing various house-keeping and management practices, increasing the efficiency of machinery, and even recycling within a process.

## D. Recycling

This involves the effective reuse of a waste as a substitute for a commercial product or as an ingredient or raw material in an industrial process; this means use, reuse, or reclamation of a waste, either on-site or off-site, after it is generated by a process. It also refers to reclaiming useful constituent fractions within a waste material or removing contaminants from a waste to allow it to be reused.

# VI. Program Objectives

## A. Focus

The focus of the program is to investigate opportunities, identify options, and perform feasibility analyses to reduce waste materials and recover residual values of those materials formerly discarded. By following the policies and procedures outlined in federal, state, and local regulations and recommended postal guidelines in Handbook AS-550, *USPS Recycling Guide*, and those that will appear in a future handbook on source reduction, the Postal Service can:

- a. Reduce waste treatment and disposal costs, raw material purchases, and other operating costs.
- b. Meet federal and state pollution prevention goals.
- c. Reduce potential environmental liabilities for hazardous and nonhazardous solid wastes.
- d. Protect public and employee health and safety.
- e. Protect the environment.

## B. Priorities

Management at all levels must develop priorities, document progress, take a national approach to pollution prevention, and monitor success. Critical elements of the program include hazardous and nonhazardous solid

wastes. Postal priorities for solid and liquid hazardous and nonhazardous waste management are:

- a. Source reduction
- b. Recycling
- c. Energy recovery
- d. Waste treatment
- e. Waste disposal

**Note:** The last alternative for managing waste in the Postal Service is the disposal of materials in landfills. This should be practiced only when all other priority alternatives have been evaluated and determined not to be in the best interest of the Postal Service.

# VII. Responsibilities

## A. General

The Postal Service is legally and socially responsible for safely managing the materials used in its operations and the waste it produces. Recycling programs are mandatory where required by law and recommended elsewhere. Because this program applies to all facilities, all administrative and operational activities must, to the maximum extent possible, participate in waste reduction by reducing it at the source and participating in environmentally sound recycling.

## B. Headquarters

### 1. Program Direction and Implementation.

The Senior Assistant Postmaster General, Administrative Services Group, is the Chief Environmental Officer for the Postal Service, and is responsible for the overall development and implementation of this program.

### 2. Development of Policies and Methods.

The Environmental Management Division, Administrative Services Group, is responsible for developing policies and methods for compliance with the Pollution Prevention Act of 1990.

## C. Regions

Regional Environmental Steering Committees must ensure participation at all levels of the field organization, and are responsible for program development, tracking, and monitoring.

## D. Divisions

General managers/postmasters are responsible for designating a recycling coordinator to develop, track, and monitor individual recycling programs at all levels of their organization.

### E. Associate Offices, Stations, and Branches

Postmasters, station managers, and supervisors are responsible for forming recycling teams, establishing recycling programs, and encouraging employee participation at smaller offices. These offices must recycle in accordance with local ordinances and participate in municipal programs. If there is no local program to reuse or recycle waste materials, these managers should explore other ways to recycle. They are also encouraged to consolidate wastes with other small facilities for recycling at a centralized place, MSC, or field division.

## VIII. Recycling Implementation

### A. General Guidelines

Postal personnel must implement low-cost, low-tech recycling options first. Generally, these are easy to implement and can be put in place almost immediately. Examples of low-cost options that do not require major capital investments, are not labor intensive, and have immediate paybacks include:

- a. Good housekeeping to prevent waste.
- b. Separation of wastes to enhance recycling.
- c. Installation of equipment or labels to enable and facilitate recycling.
- d. Use of municipal collection and recycling programs.
- e. Enforcement of rigid inventory control to insure the use of only what is needed.
- f. Exchange, transfer, or sale of waste to another recycling facility.
- g. Elimination of waste at the source.
- h. Reuse or recycling of waste within the facility.
- i. Off-site recycling of waste for postal reuse.

### B. Overview

The recycling program consists of four major steps:

- a. Understanding federal, state, local regulations and the postal policies, regulations, and responsibilities outlined in this instruction and covered in depth in Handbook AS-550, *USPS Recycling Guide*.
- b. Developing the program.
- c. Understanding the key elements that make up the recycling plan:
  - (1) Operations review.
  - (2) Marketing analysis.
  - (3) Recordkeeping procedures.
- d. Program Implementation.

### C. Program Development

#### 1. Recycling Teams

a. Each facility manager should build a recycling team. The team's size and composition will depend on the size and type of the facility and the types of wastes being generated. Specific responsibilities are discussed in the handbook.

b. Managers and team members are also responsible for conducting waste stream assessments to identify quantity, composition, and sources of wastes.

#### 2. Recycling Options

a. Managers should select the best recycling method which includes a mix of strategies ranging from separating material for curbside collection to dropping off materials at collection centers or processing facilities.

b. Managers must consider principles of sound collection, storage, and transfer when developing the program to ensure:

- (1) Convenience to postal employees and the collection methods in place.
- (2) Integrity of materials.
- (3) Acceptable methods for storing waste.
- (4) Transfer of waste to approved recycling centers.

### D. Program Implementation

**1. Strategies.** To ensure the success of the program, managers must establish realistic goals, understand materials markets, and use effective methods to promote the program.

**2. Categories of Waste.** Recyclable materials are classified into two major categories: administrative and operational. Managers need to identify the sources of recyclable materials at their facilities. Most facilities will be involved with efforts to recycle paper (undeliverable, unendorsed bulk business mail), pallets, plastics, and other wastes.

**3. Collection and Storage** Waste must be separated at the source and consolidated by waste type in an internal collection system. Once recyclables are aggregated by waste type into one location at the facility, either postal or privately contracted transportation to a recycling center should be provided. Handbook AS-550, *USPS Recycling Guide*, describes the specific procedures for collecting and storing administrative and operational waste.

**4. Equipment** It may not be necessary to purchase special equipment for recycling. However, in larger facilities a well-designed waste recovery program will require dedicated equipment such as containers for bulk storage, hauling or compacting. Facilities can purchase equipment from innovation funds or funds generated by selling recyclable materials.

**5. Transfer** Two types of vehicles (postal and private contracted) will be used to transfer postal waste to recycling centers.

## **E. Responsibilities**

### **1. Contract Solicitation and Administration.**

Directors, Support Services are responsible for soliciting and monitoring all contracts for the disposal of recyclable materials to ensure adherence to all procurement regulations and financial manuals. Procurement Service Offices and Procurement and Materiel Management Service Centers are available to assist in setting up recycling contracts.

### **2. Storage and Disposal**

*a.* Managers, Maintenance Engineering Operations, are responsible for the security and proper disposal of recyclable materials. Precautionary measures must also be taken to safeguard the confidentiality of addresses and mail contents.

*b.* A secure area must be set aside for the storage of recyclable material until disposal. The storage area used for holding

wastes scheduled for pickup must be secured with access limited to only those employees responsible for waste disposition and the recycling contractor.

*c.* Appropriate safety and health regulations (such as those pertaining to fire safety and hazardous waste) must be complied with in establishing storage areas.

## **3. Accounting**

*a.* Division Controllers are responsible for the proper accounting of funds generated from the sale of recyclables and/or the cost avoidance created by recycling as a result of reduced waste removal costs or material exchanges. When establishing a recycling program, the costs associated with separating, storing, and isolating recyclables from the waste stream and all present costs for waste removal must be considered.

*b.* Account Identification Code (AIC) 149, *Sale of Waste Paper, Twine and Dead Mail*, should be used for proceeds from the sale of waste paper, cardboard, twine, and dead-mail, newspapers, magazines and printed matter.

*c.* AIC 156, *Funds Received From Sale of Miscellaneous Equipment*, should be used to account for proceeds from the sale of defective and/or nonpostal pallets, plastics, obsolete or irreparable items, and aluminum cans and glass.